

REMARKS

In the Office Action, claims 1-4, 7-10, 12-28, 31-34, 36-46, 48-53 and 55-57 were rejected. By the present Response, claims 16, 19, 36, 38, 50, 55 and 56 are amended and claims 7-10 and 31-34 are canceled. Upon entry of the amendments, claims 1-4, 12-28, 36-46, 48-53 and 55-57 will remain pending in the present patent application. Reconsideration and allowance of all pending claims are requested.

Objections to the Claims

Claims 7-10 and 31-34 were objected to, as they were substantial duplicate of claims 1-4 and 25-28 respectively. Claims 7-10 and 31-34 have been cancelled by the present response.

Rejections Under 35 U.S.C. § 112

Claim 38 was rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. The Examiner stated that there is insufficient antecedent basis for "the simulating" as the base claim 36 does not refer to "simulating". Claims 36-38 were rejected under 35 U.S.C. § 112, second paragraph, as being incomplete for omitting essential steps. The Examiner stated that such omissions amounted to a gap between the steps.

By the present response, claim 36 has been amended to include the essential steps cited by the Examiner. Further, claim 38 has been amended to provide the antecedent basis for "the simulating". Accordingly, Applicants request that the Examiner reconsider and remove the §112 rejection of claims 36-38.

Rejections Under 35 U.S.C. § 101

Claims 50-57 were rejected under 35 U.S.C. § 101. Claims 50, 55 and 56 have been amended in conformance with the suggestions made by the Examiner.

Reconsideration and allowance of all of the affected claims are respectfully requested in view of the amendments.

Rejections Under 35 U.S.C. § 103

In the Office Action, claims 1-3, 7-9, 12-14, 25-27, 31-33, 39-41, 50-52 and 55 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Willoughby et al., U.S. Patent No. 6,549,880 (hereinafter "Willoughby") in view of Weinstock et al., U.S. Patent No. 6,223,143 (hereinafter "Weinstock") and further in view of Goyal et al., U.S. Patent No. 5,625,575 (hereinafter "Goyal"). Claims 4, 10, 15, 19-22, 24, 28, 34, 42 and 53 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Willoughby in view of Weinstock and Goyal and further in view of Spira et al., U.S. Patent Application No. 2003/0172002 (hereinafter "Spira"). Claims 16, 17, 23, 38, 44-49 and 57 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Willoughby in view of Spira, Wegerich et al., U.S. Patent Application No. 2003/0183971 (hereinafter "Wegerich"), and Weinstock and further in view of Goyal. Claim 18 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Willoughby in view of Weinstock and further in view of Spira, Wegerich, Goyal, Gross et al., U.S. Patent No. 5,774,379 (hereinafter "Gross") and Cook, U.S. Patent No. 6,546,378. Claims 36, 43 and 56 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Willoughby in view of Weinstock and further in view of Wegerich and Goyal. Claim 37 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Willoughby in view of Spira and further in view of Wegerich, Goyal, Gross and Cook.

Claims 7-10 and 31-34 have been canceled by the present response. Applicants respectfully assert that the present invention, as recited in independent claims 1, 12, 16, 19, 25, 36, 39, 43, 50 and 56 is patentable over the cited references alone or in combination. Each independent claim recites, in generally similar language, *movie mode display of the reliability analysis*. (see, Application, page 28 lines 1-27).

The Examiner stated that Goyal teaches a visualization component that provides movie mode display of reliability analysis. Applicants respectfully submit that Goyal *does not describe any reliability analysis whatsoever*. Goyal, instead teaches the use of a movie mode-like display of parts. Applicants do not dispute that such displays of parts were commonplace for various reasons—such as for part and assembly visualization. However, the visualization of the results of reliability analysis is wholly different both in its nature and in the type of data visualized. Prior to the invention, it was not known in the art to present the reliability analysis in movie mode. At the very least, none of the cited art teaches or in any way suggests doing so. Hence, even if combined, the references would not teach all the recitation of the claims, particularly the movie mode display of reliability analysis in conjunction with the other recited elements.

Further, the Applicants respectfully submit that the references cannot be fairly combined because Goyal does not describe any reliability analysis whatsoever. One skilled in the art will not be motivated to use the movie mode display of parts as described in Goyal to present the reliability analysis in movie mode. There is no suggestion to combine the cited reference absent the present application. The only possible suggestion the Examiner can find is from the application itself. When prior art references require a selected combination to render obvious a subsequent invention, there must be some reason for the combination other than the hindsight gained from the invention itself, i.e., something in the prior art as a whole must suggest the desirability, and thus the obviousness, of making the combination. *Uniroyal Inc. v. Rudkin-Wiley Corp.*, 837 F.2d 1044, 5 U.S.P.Q.2d 1434 (Fed. Cir. 1988). One cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596 (Fed. Cir. 1988). Applicant respectfully submits that none of the references suggests the combination relied upon by the Examiner or a motivation for such a combination. Accordingly, the applicants believe that the combination is not obvious to one skilled in the art and the Examiner is using

hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention.

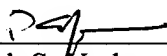
In view of the forgoing deficiencies in the teachings of the cited art, the Examiner has failed to establish a *prima facie* case of obviousness of claims 1, 12, 16, 19, 25, 36, 39, 43, 50 and 56. These claims, and the claims depending therefrom are therefore believed to be clearly patentable over the cited combination. Reconsideration and allowance of all pending claims, rejected on the basis of 35 U.S.C. § 103, are requested.

Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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